

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

ALBERT INNARELLI, ET AL,
DEFENDANTS

Crim. No. 04-30046-MAP

FILED
IN CLERK'S OFFICE
2004 DEC -9 A 11:00

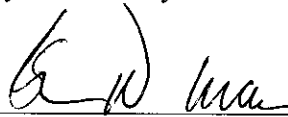
U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION OF DEFENDANT MICHAEL BERGDOLL
TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant Michael Bergdoll and moves that the conditions of his pre-trial release restricting his travel to the Commonwealth of Massachusetts be modified so as to allow the request contained herein. The defendant seeks permission to attend a musical concert with his sons, Michael and Joseph Bergdoll, at the Hartford Civic Center on Friday evening December 10, 2004. Attendance at the concert would require that Mr. Bergdoll be out of the Commonwealth from approximately 6:00pm until midnight on the evening of the concert. Counsel for the defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the defendant respectfully that the within motion be allowed.

The Defendant
Michael Bergdoll
By his attorney

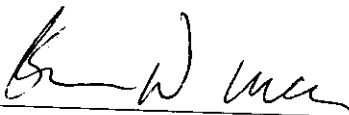


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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

December 8, 2004



Steven W. Leary